

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF TEXAS**  
**LAREDO DIVISION**

United States Courts  
Southern District of Texas  
FILED

JAN 07 2020

David J. Bradley, Clerk  
Laredo Division

**UNITED STATES OF AMERICA**

**v.**

**ALEJANDRO RODRIGUEZ-RODRIGUEZ**

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**CRIMINAL NO. 5:19-CR-2082**

**FACTUAL STATEMENT IN SUPPORT OF PLEA AGREEMENT**

The United States of America, by and through Ryan K. Patrick, United States Attorney for the Southern District of Texas and Yoona Lim, Assistant United States Attorney, and the defendant, **ALEJANDRO RODRIGUEZ-RODRIGUEZ** and the defendant's counsel, hereby stipulate as follows:

**I.**

If this case proceeded to trial, the United States of America would prove each element of the offense beyond a reasonable doubt. The following facts, among others, would be offered to establish the Defendant's guilt:

**II.**

On November 3, 2019, a driver of an Audi Q7, later identified as Alejandro Rodriguez-Rodriguez applied for admission into the United States at the Juarez-Lincoln International Bridge in Laredo, Texas, along with a passenger. Rodriguez gave a negative declaration to Customs and Border Protection (CBP) Officers, and was sent to secondary for a random inspection. At secondary, Rodriguez again gave a negative declaration for narcotics, currency, and firearms, and told CBP Officers that he was on his way to San Marcos, Texas. An x-ray of the vehicle revealed anomalies within the tires. A CBP service canine alerted to the odor of narcotics. A physical

examination of the tires revealed 26 bundles of a white powdery substance that tested positive for cocaine. The total weight of the cocaine was 31.80 kilograms.

After rights advisement and waiver, Rodriguez stated he was the owner of the Audi Q7 which he purchased approximately a week or a week and a half ago prior. Rodriguez also stated he suspected he was being interviewed by agents because he imagined something was found in his vehicle. When the agents confirmed that narcotics were found in his vehicle, Rodriguez requested a lawyer and the interview ended.

On November 4, 2019, when Rodriguez was being transported to the Webb County Jail, he made an unprovoked statement to the agents that he wanted to help out the day before during the interview but the only information he had is a nickname. The agents advised Rodriguez that he had invoked his right to have an attorney present for any further questioning on November 3, 2019, and that anything he say can be used against him in any criminal proceedings. Rodriguez reiterated that the only information he had was a nickname. No questions were asked by agents.

III.

Defendant, **ALEJANDRO RODRIGUEZ-RODRIGUEZ**, hereby confesses and judicially admits that on **November 3, 2019**, he knowingly **conspire to import 5 kilograms or more of cocaine**, in violation of Title **21**, United States Code, Section **963**.

  
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ALEJANDRO RODRIGUEZ-RODRIGUEZ  
Defendant

APPROVED:

RYAN K. PATRICK  
UNITED STATES ATTORNEY

By:  
for



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Attorney for Defendant